

IN THE UNITED STATES BANKRUPTCY COURT  
FOR THE DISTRICT OF NEBRASKA

IN THE MATTER OF:  
JON M. CADD,

CASE NO. 18-80203

CHAPTER 13

Debtor(s).

STIPULATION REGARDING RESOLUTION OF TRUSTEE'S NOTICE OF PAYMENT DEFAULT

COMES NOW, Kathleen A. Laughlin, Chapter 13 Trustee and the Debtor, by and through undersigned attorney and agree to resolution of the Trustee's Notice of Payment Default as follows:

The Debtor agrees as follows (Mark and "X" by the appropriate item and note by which the required action will take place)

1. No later than \_\_\_\_\_, 20\_\_\_\_, the debtor agrees to cure the delinquent plan payments as well as pay all regular plan payment due through the above date. [Note: the Trustee will not agree to any extension to cure of more than 60 days]
- ☒ 2. The Debtor will file a Limited Motion to Modify the Chapter 13 Plan after Confirmation pursuant to Neb. R. Bankr. P. 3015.3(B), no later than 12/24, 2018
3. The Debtor will file an Amended Plan no later than \_\_\_\_\_, 20\_\_\_\_ and obtain timely approval or confirmation of the amended plan to cure the delinquent payments.
4. The Debtor will file a Motion to convert no later than \_\_\_\_\_, 20\_\_\_\_.

[The Trustee will only agree to an amended plan, Limited Motion to Modify or an agreement to file a motion to convert that is to be filed within 30 days of the date that this stipulation is signed by the Debtor's attorney. The Trustee will not enter into a stipulation if it is not signed and dated by the Debtor's attorney and transmitted to the Trustee within two weeks of the issuance of the Trustee's Notice of Payment Default.]

DEBTOR AGREES AND UNDERSTANDS THAT IF THE ACTION WHICH THEY HAVE AGREED TO TAKE ABOVE DOES NOT OCCUR, THEN THE TRUSTEE WILL FILE A DECLARATION WITH THE COURT REQUESTING DISMISSAL OF THIS CASE. THIS STIPULATION DOES NOT AFFECT THE RIGHT OF ANY OTHER PARTY IN INTEREST TO SEEK DISMISSAL OF THIS CASE OR RELIEF FROM THE AUTOMATIC STAY.

Dated: 12/10/18

Signed: [Signature]

John T. Turco, Attorney for Debtor

Dated: 12/10/2018

Signed: [Signature]

Debtor/Co-Debtor

Dated: December 19, 2018

Signed: s/Thomas P. Kenny #16872  
for: Kathleen A. Laughlin, Trustee

Debtor's counsel should fax this proposed stipulation to the Trustee's Office at fax #1-402-530-1869. The Trustee declines to enter the above Stipulation for the following reasons:

Dated: \_\_\_\_\_

Signed: \_\_\_\_\_

Kathleen A. Laughlin, Trustee